

Monsanto

SEP 14 1981

DHW - Div. of Environment

MANUFACTURING DIVISION

MONSANTO CHEMICAL INTERMEDIATES CO.
P. O. Box 816
Soda Springs, Idaho 83276
Phone: (208) 547-3391

September 10, 1981

Mr. Kenneth D. Feigner
Chief, Waste Management Branch
Environmental Protection Agency
Region X
1200 6th Avenue
Seattle, Washington 98101

Re: EPA Identification No. IDD081830994
Withdrawal of RCRA Interim Status

Dear Mr. Feigner:

I have carefully reviewed EPA Form 8700-12 dated August 15, 1980 and EPA Forms 3510-1 and 3510-3 dated October 21, 1980, for the Monsanto Soda Springs, Idaho plant location as requested in your letter dated June 4, 1981.

I still find the forms contain unnecessary designations of GENERATION and TREAT/STORE/DISPOSE activities and unnecessary waste listings and process codes. EPA's November 19, 1980 amendment to its 40 CFR Part 261 regulations at Section 261.4(b)(6) has excluded the plant's solid wastes from RCRA Subtitle C regulations to such an extent that the plant now qualifies as a small quantity generator under 40 CFR 261.5 with regard to the non-indigenous waste mentioned in paragraph 3 of your letter. The plant's storage operations are such that the plant is not subject to the Subtitle C requirements.

On the basis of both sections 261.4(b)(6) and 261.5, therefore, the plant is not subject to the RCRA requirements for notification and/or submissions of a Part A Permit Application. Please return the Notification and the EPA Part A Application to me at the above address.

Sincerely,

D. W. Haines
D. W. Haines
Plant Manager

DWH:res
cc: ☒ Daryl Koch - IDHW
Athena Lalikos - EPA

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